

To: Peronard, Paul[Peronard.Paul@epa.gov]
Cc: Rockeman, Karl H.[krockema@nd.gov]; dglatt@nd.gov[dglatt@nd.gov]
From: Roberts, Kris D.
Sent: Tue 7/29/2014 2:47:20 PM
Subject: RE: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Good morning Paul. Just got out of morning meeting. Now have 6 aerators going, and last two coming up from Dickinson this morning. Circulation going, over about 100 foot segments, but not sure how many as of this morning.

Did talk with Dave a bit. They have new IAP and Heat Stress Management plans out. Want review/sign by both us and START ? for you?. I reviewed and signed. Didn't see any obvious holes. Somewhat generic, but covers most of the concerns to date.

We did discuss the idea of treating the water, both yesterday at the video conf with Bismarck, and this morning. Waiting on analytical, but I think Mike Crocker would like to start ramping up for it now. He is somewhat freaked about the potential for weather to turn on us. He has been here for a few of our worst unpredictable weather years now. Nuff said. Garner/CTEH is looking at availability and costs as part of prep. Thinking of bag filter, sand filter, then carbon at this point, and circulate in the two stretches north and south of the rr, but above the Narrows. Some concern for salt concentrations, but I told them that while our initial reading on the Wednesday sample from runoff did show elevated numbers for Na and Cl, neither were in a toxic range, and I don't expect that to be much of an issue. Turbidity would be a bigger one. A nice brown plume from the COE pumping plant into the Missouri would not go unnoticed.

By the way, Narrows plugged and the culvert at the COE office is plugged, but according to Jeff Keller yesterday at 17:00. They have not turned the pumps back on. Waiting for orders from Todd Lindquist or above. Have we been back in contact to let them know it is OK to kick it back on, and so the city can discharge too??? And also, Jeff told me yesterday that the wider reach from the Narrows to the COE office is actually the old Little Muddy River channel, and it likely to be around 10 feet deep in the middle. The flood control dike cut this off. I didn't know that, but explains why that extra width.

Loren Bruder (sp?), a ND certified asbestos inspector has been retained by Travelers Insurance to do the asbestos inspection and sampling of the main building – Thursday likely. He is also bringing in an electrical engineer to look at cause (?). Likely won't have main building release until after Thursday sometime, but expect to get release on the lean-to and perimeter areas later

today.

David and Ellie available for asbestos assistance, if asked, in that case?

Dry weather has resulted in a higher particulate release yesterday evening, and for a while, they shut down East Dakota Parkway. From that, they will have their fire crew institute a work zone dust suppression role now as well, beginning today.

I am just checking emails and with the the office, and then hitting the road for a few hours of spills and thrills duty in Williams and Divide Counties. Plan on being back for the 16:00 meeting, if possible. Both David and CTEH believe they will have analytical results to share then. Will check and see if we have some ready as well.

Oh, yes, the Slumberge impact area was scraped yesterday, and confirmation samples were collected. As soon as results are received, they will bring their perimeter berm there in to the property line.

Guess that is all for now, any questions, call me on my cell phone.

Kris Roberts

Environmental Response Team Leader

ND Department of Health

Division of Water Quality

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kroberts@nd.gov

From: Peronard, Paul [mailto:Peronard.Paul@epa.gov]
Sent: Tuesday, July 29, 2014 9:12 AM
To: Roberts, Kris D.
Subject: Re: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Hey Kris, I hope all is well this morning. I've sent Dave an e-mail, but if you see him ask about our lab data. It should be in.

paul

From: Roberts, Kris D. <kroberts@nd.gov>
Sent: Monday, July 28, 2014 4:36:50 PM
To: Peronard, Paul
Subject: RE: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Paul:

Bounce that question off Sandi Washek. I think she likes your method better than ours, but still has some hoops Garner is going to have to jump through, including a demolition permit. Looks pretty well demolished already to me though .

(:>)

From: Peronard, Paul [mailto:Peronard.Paul@epa.gov]
Sent: Monday, July 28, 2014 2:56 PM
To: Roberts, Kris D.; jpavlicek@garner-es.com; dcawthon@cteh.com
Subject: Re: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Hey All,

Before we jump too far down the road of NESHAP regulations let's get some samples and see if there is any ACM. If not the handling of the debris will get much easier. If there is ACM it might be worth our while to isolate it with further sampling to minimize where the NESHAP rules apply. I'm not directly familiar with ND regs, but most States have some alternative standards for fire damaged or otherwise structurally unsound buildings.

Paul

From: Roberts, Kris D. <kroberts@nd.gov>

Sent: Monday, July 28, 2014 1:26:27 PM

To: jpavlicek@garner-es.com; dcawthon@cteh.com

Cc: Peronard, Paul

Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

John and Dave:

After shoving the question up the line to my office and Paul Peronard, I got back two thing.

1) From Paul Peronard – USEPA OSC – The START contractors, David and Ellie will be tasked with Asbestos inspection. They can probably use some help, as the whole building under NESHAP must be inspected/sampled(?), as it is commercial. So, David, if you can get the your classes and certificate information together quickly, our folks have been told to fast track a ND certificate for you.

2) The email from Sandi Washek, below, goes into the other details that will be applicable to this cleanup of the building materials. I suggest that you direct any questions about that email directly to Sandi.

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From: Washek, Sandra K.

Sent: Monday, July 28, 2014 2:09 PM

To: Roberts, Kris D.; O'Clair, Terry L.

Cc: Kangas, Jane K.; Otto, Justin L.; Patrick, Dale P.

Subject: RE: /Update - Williston RR Sup. Fire - Sunday - 7/27/14 - Update information for asbestos in Williston

Kris:

This is the regulations or options the company have when the START Team leave the site. If the START team stay and maintain the site the Asbestos Program still needs a Notification of Demolition for the site for its records.

This information addresses the cleanup of the fire damaged Red River Supply Company Warehouse building located in Williston, North Dakota. Without an inspection by a ND Certified Asbestos Inspector, regulated asbestos-containing materials cannot be ruled out of certain areas of burnt debris because of the physical condition of the debris. Therefore, fire damaged materials must be handled as regulated asbestos-containing materials.

The following conditions must be met while conducting the cleanup operations of the debris that has been identified as suspect asbestos containing:

1. Have at least one North Dakota Certified Asbestos Abatement Supervisor present at all times during further handling and disposal activities.
2. Plan for work during periods of little or no wind to minimize the likelihood of wind-borne asbestos fiber spread.
3. Adequately wet the waste material, if above 32 degrees Fahrenheit, and maintain wet, during any further handling, transportation and disposal.
4. Release no visible emissions off the work site from asbestos-containing materials.
5. The materials must be hauled to an approved landfill as assumed regulated asbestos-containing material and must be accompanied by a waste manifest form (enclosed). The materials must be covered during transportation.

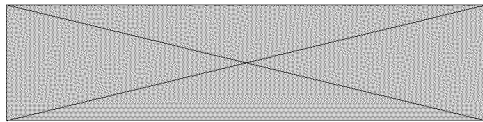
Items like concrete, concrete blocks, steel, glass, and clean wood do not have to be treated as asbestos waste. Those items should be washed off and may be handled by individuals who are not certified as asbestos workers, and deposited at an inert landfill or recycled.

In addition, a Notification of Demolition and Renovation form should be completed and submitted to the Department as soon as possible. The ten-day waiting period will not be necessary for this cleanup project.

For school buildings built after October 12, 1988, a letter from the building architect or contractor stating there was "no asbestos building products" were used in the construction of the building can be substituted for the asbestos inspection. This exemption only pertains to K – 12 school buildings and not any type of commercial/ or public buildings. Commercial and public buildings are regulated under NESHAP and the ND Air Pollution Control Rules.

Thank you for your cooperation and feel free to call Justin Otto or Jane Kangas of the Air Quality Division at 701-328-5188 if you have any questions.

Sandi Washek



Sandi Washek
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From: O'Clair, Terry L.
Sent: Monday, July 28, 2014 11:58 AM
To: Washek, Sandra K.
Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14
Importance: High

Sandi,

See message to Jane below. What are your thoughts?

Terry

From: O'Clair, Terry L.
Sent: Monday, July 28, 2014 9:41 AM
To: Kangas, Jane K.
Subject: FW: /Update - Williston RR Sup. Fire - Sunday - 7/27/14
Importance: High

Jane,

See the underlined paragraph in Kris's email. If one of the START contractors is CO certified would we be ok with allowing them to move forward? Our rules typically are for things that must be done for demolition purposes; however, they are not clear on addressing clean up from a burn site. Your thoughts?

Terry

From: Roberts, Kris D.
Sent: Sunday, July 27, 2014 6:02 PM

To: Glatt, Dave D.; Rockeman, Karl H.; Radig, Scott A.; O'Clair, Terry L.; Peronard, Paul
Subject: /Update - Williston RR Sup. Fire - Sunday - 7/27/14
Importance: High

Lime Piles could not be covered due to debris around them.

SO2 readings around south and east perimeter berm running 2-3 ppm. PEL is 5 ppm. Doesn't appear that there is a STEL anymore, but they are planning on anyone in the work zone being in respiratory protection at levels above 0.2 ppm.

Some equipment adjusters are coming tomorrow (Monday) morning, and RR Supply doesn't want to move a lot of things around until they are done. Best estimate now is both fire marshal and adjusters will release around noon.

An issue has come up relating to Asbestos. One part of the burned building (the NW corner) is older than the other parts. They are thinking that there might be an issue there. They are definitely willing to take samples and get them to a lab, but neither Garner or CTEH has a ND certified tech on site. So here is the possible solution, it works for us. Ellie (one of the START contractors) is Colorado asbestos certified, and David (the other START guy) has many years of asbestos experience, but has let his certification drop. One of the CTEH guys is in the same boat, experience, but certification expired.

So, can these 3 do the sampling on this emergency cleanup site under ND regs? Waiver, exception, what have you, to get the answers they need? Please get back to me with an answer on that.

Plan is to clean that little sliver of the Schlumberger property in the morning, and bring the perimeter fence/berm in to the RR property line.

They have been filling sand supersacks this afternoon, but crane place says no until Monday morning. So Narrows plug will be upgraded then.

There was another flare up about 14:40 today that slowed everyone down until the fire crew cooled it down.

Of the circulation pumps that Paul wanted in the “Little Muddy Relief Channel”, 3 are in and operating, only deployment instructions weren’t conveyed to the “doers”. One pump I saw was pumping away merrily, with the intake and the discharge within about 5 feet of each other. Brought that to Garner’s attention after the 16:00 meeting, and the heads just got shaken with a bit of a lopsided smile. Immediate call went out for a whole lot more 2” hose so we can get intake and discharge closer to 100 feet apart. Tried to think it through, and it was finally decided to put the intake about 100 feet away from the bubbler and the discharge at the bubbler. If that is the wrong way around, let me know.

One of the best pieces of news today was that RR Supply send one of the warehouse workers over and he was able to “place” most of the inventory within the burn photo. There were a lot of happy faces when that was done. I will get a photo of that in the morning. For future incidents, we definitely want to make that effort.

There was a quite a bit of discussion of how to best go about getting the steel and such away from the chemical areas, and how to go about separating the now empty containers from those that still have chem. in them. A lot of thinking on that is going to go on tonight and tomorrow morning.

Kris Roberts

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